Exhibit D

STATE OF INDIANA)	IN THE HAMILTON COUNTY COURTS
) SS: COUNTY OF HAMILTON)	CAUSE NO. 29D03-2107-PL-004994
NEXTGEAR CAPITAL, INC.)
Plaintiff,)
vs.)
MOHAMED AHMED BIBAS,)
Defendant.)

NOTICE TO PLAINTIFF OF DEFENDANT'S NOTICE OF REMOVAL

TO: Michael G. Gibson Tyler Marie Alford NextGear Capital, Inc. 11799 N. College Ave., Carmel, IN 46032

You are hereby notified that Defendant, Mohamed Ahmed Bibas, in the above-titled cause, has, on the 27th of August 2021, filed in the United States District Court for the Southern District of Indiana, Indianapolis Division, its Notice of Removal of the above-titled cause to said United States District Court, a copy of which is attached hereto and made a part of this notice, for your consideration and guidance, all as provided by law.

Respectfully submitted,

PLEWS SHADLEY RACHER & BRAUN LLP Attorneys for Mohamed Ahmed Bibas

George M. Plews (Atty. No. 6274-49) Colin E. Connor (Atty. No. 28504-49) Nicholas J. Bognanno, (Atty. No. 35744-49) PLEWS SHADLEY RACHER & BRAUN LLP 1346 North Delaware Street Indianapolis, IN 46202-2415

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on all counsel of record by electronic service via the Indiana E-Filing System (IEFS) on August 27, 2021.

Michael G. Gibson (Atty. No. 29665-49) Tyler Marie Alford (Atty. No. 32495-29) 11799 North College Avenue Carmel, IN 46032 Telephone: (317) 740-3249

Attorneys for Plaintiff, NextGear Capital, Inc.